IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GLENDA JOHNSON ET AL.,)	
Plaintiffs,)	
)	Case No. 2:11-cv-005782-PD
V.)	and all related cases
SMITHKLINE BEECHAM CORPORATION ET AL.,)))	
Defendants.))	

DEFENDANTS' STATEMENT IN RESPONSE TO THE PROCEDURAL MEMORANDUM AND ORDER OF THE SPECIAL DISCOVERY MASTER

Defendants hereby waive participation in and discovery into the in camera review and proceedings addressed in the Procedural Memorandum and Order of the Special Discovery Master (Doc. 539) and Memorandum and Order Correcting Procedural Memorandum of the Special Discovery Master (Doc. 540).

Respectfully submitted,

/s/ Michael T. Scott
Michael T. Scott
Sandra M. Di Iorio
REED SMITH LLP
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, Pennsylvania 19103

Telephone: (215) 851-8100 Facsimile: (215) 851-1420 Sonja S. Weissman (admitted pro hac vice) REED SMITH LLP

101 Second Street

San Francisco, California 94105

Telephone: (415) 543-8700 Facsimile: (415) 391-8269

Attorneys for Defendants GlaxoSmithKline LLC and GlaxoSmithKline Holdings (Americas) Inc.

/s/ Craig A. Knot

Sara J. Gourley (admitted pro hac vice)
Eugene A. Schoon (admitted pro hac vice)
Craig A. Knot (admitted pro hac vice)
Elizabeth C. Curtin (admitted pro hac vice)
SIDLEY AUSTIN LLP
One South Dearborn Street
Chicago, Illinois 60603

Telephone: (312) 853-7000 Facsimile: (312) 853-7036

Albert G. Bixler
ECKERT SEAMANS CHERIN & MELLOTT, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, Pennsylvania 19102
Telephone: (215) 851-8400
Facsimile: (215) 851-8383

Attorneys for Grünenthal GmbH

/s/ Daniel S. Pariser

Daniel S. Pariser (admitted pro hac vice)
Paige H. Sharpe (admitted pro hac vice)
ARNOLD & PORTER LLP
601 Massachusetts Avenue, NW
Washington, DC 20001

Telephone: (202) 942-5000 Facsimile: (202) 942-5999

Anand Agneshwar (admitted pro hac vice)
Bruce R. Kelly (admitted pro hac vice)
ARNOLD & PORTER LLP
399 Park Avenue
New York, NY 10022
Telephone: (212) 715-1000

Facsimile: (212) 715-1399

Kenneth A. Murphy
DRINKER BIDDLE & REATH LLP
One Logan Square
Suite 2000
Philadelphia, Pennsylvania 19103
Telephone: (215) 988-2700

Facsimile: (215) 988-2757

Attorneys for Sanofi-Aventis U.S. LLC

Dated: December 12, 2016

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2016, a copy of this document was filed

electronically and is available for viewing and downloading from the CM/ECF system. I also

certify that a true and correct copy of the foregoing document is being served this day on all

counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF. A true

and correct copy of the foregoing document is also being served this day on the following by

U.S. mail:

John Marshall 25670 West Spruce Street Lacombe, LA 70445

/s/ Michael T. Scott

Michael T. Scott